

# **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>In re:</b>  <b>ARTIUSID, INC.,</b>  <b>Alleged Debtor.</b>	§ § § § §	<b>Case No. 23-11007-cgb</b>  <b>Chapter 7</b>
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**NOTICE OF TAKING DEPOSITION OF COLLABORATIVE VISION**

**To:** Collaborative Vision, LLC  
c/o Lynn Butler  
Husch Blackwell LLP  
1111 Congress Ave, Ste 1400  
Austin, TX 78701

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Fed.R.Civ.P. and Rule 7030 of the Fed.R.Bankr.P., Artius.ID, Inc. – as alleged debtor, by and through undersigned counsel – intends to depose Collaborative Vision, LLC on the topics set forth in the attached Exhibit A. The deposition will be taken under oath before an officer authorized to record the testimony and recorded by video at the following date, time and location:

**PLACE:** O'Hagan Meyer  
805 SW Broadway, Suite 2280  
Portland, Oregon 97205

**DATE:** September 18, 2024

**TIME:** 9:00 a.m. (Pacific Time)

The deposition may continue from day to day until completed.

Dated: September 13, 2024

**BAKER & MCKENZIE LLP**

By: /s/ Alexander D. Burch  
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*Counsel for Debtor artuis.iD*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail on all the parties listed below on September 13, 2024.

/s/ Alexander D. Burch

Alexander D. Burch

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## **EXHIBIT A**

### **DEFINITIONS**

The following definitions apply to the below Deposition Topics:

- a. “Proceeding” means the action in which this deposition is being sought.
- b. “Debtor” means the alleged debtor in this Proceeding, artiusID, Inc., including all predecessors of the Debtor.
- c. “You” means Collaborative Vision, LLC, the entity to which this deposition is directed.
- d. “Objection to Dismissal” means Your Objection to Consent Stipulation and Motion for Dismissal of Involuntary Petition Under Chapter 77 [Doc. 99].
- e. “Client Service Agreement” has the definition ascribed to it by You in Your Objection to Dismissal.
- f. “Oregon Lawsuit” means the lawsuit filed by you against the Debtor in Oregon and styled *Collaborative Vision, LLC v. Q5ID, Inc.*, No. 23CV15182, In the Circuit Court of the State of Oregon for the County of Multnomah.
- g. “Complaint” means the Complaint filed by You in the Oregon Lawsuit and attached as exhibit 6 to the Objection to Dismissal.

### **DEPOSITION TOPICS**

1. All amounts You contend are owed to You by Debtor and the basis for such claim.
2. The Oregon Lawsuit between You and Debtor and all allegations and claims asserted by You in the Complaint.
3. The negotiation of all terms set forth in the Client Service Agreement.
4. Lisa Matar’s relationships and communications with employees of Debtor, including but not limited to Dominic Odierno, Steve Larson, Brian Grant.
5. All performance by You under the Client Service Agreement.
6. All employee placements by You under the Client Service Agreement, including Lisa Matar, her daughter, and each person identified in exhibit 3 to the Objection to Dismissal.
7. The positions and roles with the Debtor for each individual placed by You under the Client Service Agreement and the skills and experience of each individual placed by You with Debtor that rendered each person placed fit for the position or role.
8. The payroll loan referenced in the Objection to Dismissal.

9. Lisa Matar's communications with the Debtor's principals as alleged in the Objection to Dismissal and the Complaint.

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<b>In re:</b>  <b>ARTIUSID, INC.,</b>  <b>Alleged Debtor.</b>	§ § § § §	<b>Case No. 23-11007-cgb</b>  <b>Chapter 7</b>
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**NOTICE OF TAKING DEPOSITION OF LISA MATAR**

**To:** Lisa Matar  
c/o Lynn Butler  
Husch Blackwell LLP  
1111 Congress Ave, Ste 1400  
Austin, TX 78701

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Fed.R.Civ.P. and Rule 7030 of the Fed.R.Bankr.P., Artius.ID, Inc. – as alleged debtor, by and through undersigned counsel – intends to depose Lisa Matar of Collaborative Vision, LLC. The deposition will be taken under oath before an officer authorized to record the testimony and recorded by video at the following date, time and location:

**PLACE:** O'Hagan Meyer  
805 SW Broadway, Suite 2280  
Portland, Oregon 97205

**DATE:** September 18, 2024

**TIME:** 1:00 p.m. (Pacific Time)

The deposition may continue from day to day until completed.



Dated: September 13, 2024

**BAKER & MCKENZIE LLP**

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*Counsel for Debtor artuis.iD*

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I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail on all parties listed below on September 13, 2024.

/s/ Alexander D. Burch

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